

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

ALMA T. MCBROOM,
PLAINTIFF

*
*

VS.

* CIVIL ACTION NO. 2:06 CV767-F

JOHN E. POTTER, POSTMASTER *
GENERAL UNITED STATES POSTAL *
SERVICE; NATIONAL POSTAL *
MAIL HANDLERS UNION; THE *
MONTGOMERY ALABAMA AREA *
LOCAL AMERICAN POSTAL WORKERS *
UNION, AFL-CIO; and VANESSA *
GORDON, *
DEFENDANTS *

INTERROGATORIES AND REQUEST FOR PRODUCTION

COMES NOW Defendant, CONNIE FREEMAN by and through
counsel and propounds the following Discovery Request on
Plaintiff:

1. State your full name, address, social security number, and date of birth.
2. Please state the full name and complete address of all treating physicians who have found, treated, and diagnosed you to be disabled as alleged in your Complaint.
3. Please state why it took you until March 30, 2006 to "discover" a grievance has allegedly not been filed by the Local Union.

4. Please state by what authority the Local Union is required to file a grievance on your behalf.
5. Please provide all jobs you have held for the last 10 years by name, complete address and reason for leaving.
6. Please state whether you have ever been convicted of a crime.
7. Please state why you have ever previously been a Plaintiff or Defendant in a lawsuit and provide the name of the case and it's Case Number along with when and where it was filed.

REQUEST FOR PRODUCTION

1. Please provide all documents that would support your claim of total disability as alleged in your complaint.
2. Please provide all documents that support your claim that the Local Union failed to pursue a grievance on your behalf.

3/29/07
DATE

/s/ William P. Roberts, II
SIGNATURE OF COUNSEL

COUNSEL FOR:
CONNIE FREEMAN
HOWELL, SARTO & HOWELL
P.O. Box 681864
147 E. Main St.
Prattville, AL 36068-1864
(334)365-2286

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing upon the following by U. S. Mail, first class, postage pre-paid and through the Court's electronic filing system:

Debrorah Nicknson
2820 Fairlane Drive, A-10
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Dated: March 29, 2007 /s/ William P. Roberts, II